

THE HONORABLE JAMES L. ROBART

IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANNA PATRICK, DOUGLAS MORRILL,
ROSEANNE MORRILL, LEISA
GARRETT, ROBERT NIXON,
SAMANTHA NIXON, DAVID
BOTTONFIELD, ROSEMARIE
BOTTONFIELD, TASHA RYAN,
ROGELIO VARGAS, MARILYN DEWEY,
PETER ROLLINS, RACHAEL ROLLINS,
KATRINA BENNY, SARA ERICKSON,
GREG LARSON, and JAMES KING,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

DAVID L. RAMSEY, III, individually;
HAPPY HOUR MEDIA GROUP, LLC, a
Washington limited liability company; THE
LAMPO GROUP, LLC, a Tennessee
limited liability company,

Defendants.

Case No. 2:23-cv-00630- JLR

**STIPULATION BETWEEN PLAINTIFFS
AND DEFENDANT HAPPY HOUR MEDIA
GROUP, LLC
AND
[PROPOSED] ORDER AMENDING
DEADLINES RELATED TO HAPPY HOUR'S
MOTION TO DISMISS**

Noted: October 31, 2023.

1 WHEREAS, Happy Hour has filed a motion to dismiss the Complaint (Dkt. 32), which is
2 noted for consideration on November 10, 2023,

3 WHEREAS, by stipulated order (Dkt. 24), the Opposition to Happy Hour's motion to
4 dismiss is due on November 2 and the reply is due on November 10, 2023,

5 WHEREAS, on October 26, 2023, Plaintiffs moved to amend their complaint with a noted
6 hearing date of November 17, 2023 (Dkt. 40),

7 WHEREAS, under the present schedule, the Plaintiffs and Happy Hour would complete
8 the briefing on the motion to dismiss before knowing whether and to what extent the Complaint
9 will be amended,
10

11 WHEREAS, having the Court consider the motion to dismiss before it decides the motion
12 to amend could lead to a need to renew or alter the motion to dismiss or otherwise use judicial time
13 inefficiently or create confusion,
14

15 WHEREAS, the Plaintiffs and Happy Hour have met and conferred in an attempt to
16 promote efficiency,

17 THEREFORE, Plaintiffs and Happy Hour stipulate that:

- 18 1. Happy Hour may withdraw its pending motion to dismiss without prejudice to Happy
19 Hour's right to re-file the motion to dismiss or to file an amended motion to dismiss;
20 and
21
22 2. The deadline for Happy Hour to file its motion to dismiss will be the first Thursday that
23 is not fewer than ten court days after the Court denies the pending motion for leave to
24 amend the complaint or the Plaintiffs file their first amended complaint after being
25 given leave to do so.

ALBERT LAW PLLC

By: s/ Gregory W Albert
Gregory W Albert, WSBA #42673
Jonah L Ohm Campbell, WSBA #55701
Tallman Harlow Trask, IV, WSBA #60280
3131 Western Ave, Suite 410
Seattle, WA 98121
Phone: (206) 576-8044
Fax: 425-659-2678
Email: greg@albertlawpllc.com
jonah@albertlawpllc.com
tallman@albertlawpllc.com

FRIEDMAN RUBIN PLLC (SEATTLE-DOWNTOWN)

By: s/ Roger S. Davidheiser
Roger S. Davidheiser, WSBA #18638
1109 1st Ave Ste 501
Seattle, WA 98101-2988
Phone: (206) 501-4446
Fax: 206-623-0794
Email: rdavidheiser@friedmanrubin.com

Attorneys for Plaintiffs

CORR CRONIN LLP

By: s/ Jack Lovejoy
Jack Lovejoy
1015 Second Avenue, Floor 10
Seattle, WA 98104-1001
Phone: (206) 625-8600
Email: jlovejoy@corrchronin.com

Attorney for Defendant Happy Hour Media Group, LLC

[PROPOSED] ORDER

IT IS SO ORDERED.

DATED this _____ day of _____, 2023.

The Honorable James L. Robart
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2023, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/ Wen Cruz

Wen Cruz